

# EXHIBIT I

### Benchmark Study of Civil Rights Workforce Staffing

A **benchmark study** of civil rights staffing for U.S. Department of Treasury employment complaint functions revealed that USDA CR's office is significantly understaffed when compared with Treasury's staffing levels used to process a comparable number of employment complaints. They have a similar sized workforce and number of employment complaints filed. The annual employment complaints filed per fiscal year were similar or greater in numbers to the complaints filed in USDA. The table below reflects the staffing versus complaints filed in the fiscal year 1999.

Description	USDA	Treasury	Comment
Workforce	112,700	127,000	
Complaints filed in Fiscal Year 1999	972	1,478	Total number of complaints filed for the fiscal year.
Staffing Levels	29	82	USDA CR staff needs to be increased to 52.55 to have the same relationship to number of complaints filed at the U.S. Treasury Department.  These staffing numbers exclude investigators because USDA CR uses contractor investigators and U.S. Treasury use staff investigators.

# BENCHMARK OF CR STAFFING FOR USDA AND TREASURY FY 1999

FUNCTION	AGENCY			
	USDA Employees 112,700		TREASURY Employees 127,000	
1. Complaints Filed	972		1478	
2. Complaints accepted	331			
3. Investigations completed	361	Average Days	732	Average Days
		485		361
a. Investigations-180 days or less	6 (1.6%)	158	359 (49%)	145
b. Investigations - 270 days or more	303 (84%)	534	138 (49%)	347
c. Investigation Costs	\$3,292,458		\$2,125,968	
5. Cases closed	756	Average Days	1338	Average Days
		678		361
a. Dismissals	111	610	550	137
b. Withdrawals	30	527	155	266
c. Settled	318	564	255	388
d. FAD	254		378	705
d-1 FAD discrimination	11		5	1035
d-2 FAD No discrimination	243		373	701
e-1 FAD no hearing	177	861	269	686
e-2 FAD hearing	77		109	755

# BENCHMARK OF CR STAFFING FOR USDA AND TREASURY FY 1999

	AGENCY	
	USDA	TREASURY
6. <u>Year end inventory</u> as of 10/1/99	1679	1806
a. Pending acceptance	749 (45%)	266 (15%)
b. Pending invest.	261 (16%)	480 (27%)
c. Pending hearing	394 (47%)	834 (46%)
d. Pending FAD	148 (9%)	226 (13%)
<b>STAFFING</b>		
1. ACCEPTANCE / DISMISSAL (see 1 & 2 above)	<ul style="list-style-type: none"> <li>1 MANAGER</li> <li>12 SPEC</li> <li>2 TECH</li> <li>2 CLERKS</li> <li>2 FILE CLKS</li> <li>3 TEMPS</li> </ul> <u>19PFT TOTAL</u> - ECD	<ul style="list-style-type: none"> <li>40 Spec</li> <li>10 mgs</li> <li>20 support</li> </ul> <u>70 PFT TOTAL</u>
1.a. Location	NHQ	<ul style="list-style-type: none"> <li>4 Regional Complaint Centers</li> </ul>
2. INVESTIGATIONS (see 3 to 3.c above)	<ul style="list-style-type: none"> <li>Contractors</li> </ul>	<ul style="list-style-type: none"> <li>Regional Complaint Centers - 24 PFT 251 collateral</li> </ul>
• ROI REVIEWS	• ECD (12 spec)	• RCC (40 spec)
2.a. Location	National	Regional Complaint Centers and collateral - in the field
3. FADS (see 5.d above)	<ul style="list-style-type: none"> <li>EAD - 1 MANAGER</li> <li>8 SPEC</li> <li>1 TECH</li> <li>3 TEMPS</li> </ul> <u>10 PFT TOTAL</u>	<ul style="list-style-type: none"> <li>Director Deputy Asst Director, Complaint Ops.</li> <li>1 Supv EEO spec</li> <li>7 Spec</li> <li>1 EEO asst</li> <li>1 student</li> </ul> <u>12 PFT TOTAL</u> <u>1 PART TIME</u>



# BENCHMARK OF CR STAFFING FOR USDA AND TREASURY FY 1999

	AGENCY	
	USDA	TREASURY
STAFFING		
<u>Employees per Functional Area</u>	<ul style="list-style-type: none"> <li>ECD 19</li> <li>Investigator 0</li> <li>EAD 10</li> <li>TOTAL 29</li> </ul>	<ul style="list-style-type: none"> <li>RRC 70</li> <li>Investigator 25</li> <li>OEOP 12</li> <li>TOTAL 107</li> </ul>
<u>ORGANIZATION OF COMPLAINT PROCESS</u>	<ul style="list-style-type: none"> <li>Agency - infor.</li> <li>ECAD - acc. &amp; invest. referral &amp; ROI review</li> <li>EAD - FADs</li> </ul>	<ul style="list-style-type: none"> <li>RCCs - accept, dismiss, investigate</li> <li>OEOP - FADs</li> </ul>